



September 24, 2007

Ms. Cate Alexander Brennan  
Communications Director  
National Nanotechnology Coordination Office  
4201 Wilson Blvd.  
Stafford II, Rm. 405  
Arlington, VA 22230

**Re: Prioritization of Environmental, Health, and Safety Research Needs  
for Engineered Nanoscale Materials – An Interim Document for Public  
Comment, Nanotechnology Environmental and Health Implications (NEHI)  
Working Group**

Dear Ms. Brennan:

The Grocery Manufacturers/Food Products Association (GMA/FPA) represents the world's leading food, beverage and consumer products companies. The association promotes sound public policy, champions initiatives that increase productivity and growth and helps to protect the safety and security of the food supply through scientific excellence. The GMA/FPA board of directors is comprised of fifty-two chief executive officers from the Association's member companies. The \$2.1 trillion food, beverage and consumer packaged goods industry employs 14 million workers, and contributes over \$1 trillion in added value to the nation's economy.

GMA/FPA ("The Association") appreciates the opportunity to comment on the August 2007 Interim Document, "Prioritization of Environmental, Health, and Safety Research Needs for Engineered Nanoscale Materials." The Association commends NEHI for taking account of certain issues critical to safeguarding the nation's food supply and protecting the public health raised in our prior comments following the public meeting held January 4, 2007 (our letter of January 31, 2007). The Association continues to believe that, in addition to addressing key research needs and priorities to understand and manage risks of engineered nanomaterials (ENM), certain cross-cutting issues must be addressed to ensure consumer confidence in ENM:

- Access To Government-Funded EHS Research And Information

Priority should be given to establishing mechanisms and programs that make the body of existing EHS related research on nanoscale materials readily accessible to industry, governmental and academic researchers. Understanding and managing EHS risks posed by ENM will depend on an unprecedented degree of collaboration across scientific disciplines. While there is a significant need to conduct new research on the EHS implications of ENM, a substantial portion of

the funds available should be directed toward a system that would make existing EHS studies readily available to scientists engaged in risk research to promote this collaboration.

- Public-Private EHS Research Collaboration

GMA/FPA believes companies developing and marketing ENM for commercial use should continue to be responsible for the safety of their products and for any EHS studies that may be necessary for ensuring product safety, occupational health and EHS implications of intentional or accidental release and related exposures. Collaboration among industry, governmental, and academic scientists is critical to address the significant EHS research needs effectively, and to avoid costly redundancy and delays. To foster such collaboration, mechanisms and safeguards are needed that will encourage scientists to share information concerning EHS implications of ENM in ways that are genuinely rewarding and ensure adequate safeguards to protect confidential commercial information and proprietary aspects of industry research.

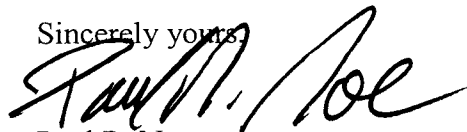
- Adequate Funding for EHS Research

The NEHI Working Group is now evaluating the current research portfolio of the National Nanotechnology Initiative (NNI) against the priorities set forth in the Interim Document ("gap analysis") to identify priority areas that are not being addressed by currently funded research. With this information, NNI will develop a research strategy to address the priorities and unmet needs that will provide a framework for use by individual agencies to guide the development of their mission-related research plans. The Association recognizes that, as valuable as this effort is, the necessary research cannot be accomplished without assuring that adequate funding is dedicated to EHS research for ENM.

GMA/FPA continues to be concerned that any work with ENM, whether involving research investigations or commercial applications, presents the potential for ENM to be released accidentally into the environment. Such releases would have the potential to affect the food supply, directly or indirectly, through the contamination of soil, water and/or air. Comprehensive EHS research with respect to all applications of ENM should extend to all lifecycle stages of the material, and should encompass all studies necessary to ensure the safety of the food supply, whether or not application of the engineered nanomaterials in food production is anticipated. In the Research Category: Nanomaterials and the Environment, the highest priority should be given to understanding the fate, transport and transformation of ENM in the environment. Only when these principles are characterized can the risks of accidental releases be adequately assessed and managed.

The Association would again like to commend NEHI for undertaking this process of prioritizing EHS research needs. Thank you for the opportunity to comment on this important issue.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul R. Noe", written in a cursive style.

Paul R. Noe

Vice President, Regulatory Affairs